

August 20, 2009

Wisconsin Power and Light Company

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Docket No. 5-CE-137

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## **VIA HAND DELIVERY**

David C. Bender Pamela R. McGillivray McGillivray Westerberg & Bender LLC 305 S Paterson St. Madison, WI 53703-3552

RE:

Joint Application of Wisconsin Power and Light

Company and Wisconsin Electric Power Company for Certificate of Authority to Install a

NO<sub>x</sub> Reduction System and Selective Catalytic Reduction (SCR), at the Edgewater Generating

**Station Unit 5** 

Dear David and Pamela:

Enclosed please find Wisconsin Power and Light Company's supplemental response to Request for Production 3 from Sierra Club's First Set of Discovery in the above-referenced docket, along with an associated CD.

If you have any questions or concerns, please feel free to contact me.

Sincerely

Michael Greiveldinger Attornev

MSG/kmc

Enclosure(s)

# BEFORE THE PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of Wisconsin Power and Light Company and Wisconsin Electric Power Company for a Certificate of Authority to Install a Selective Catalytic Reduction System for NOx Removal on Unit 5 at the Edgewater Generating Station, Sheboygan County, Wisconsin

Docket No. 5-CE-137

## Wisconsin Power and Light Company's Supplemental Response to Sierra Club's First Set of Discovery to Wisconsin Power and Light Company

To: David C. Bender
Pamela McGillivray
McGillivray Westerberg & Bender LLC
305 S. Paterson St.
Madison, WI 53703

bender@mwbattorneys.com mcgillivray@mwbattorneys.com

Counsel for Sierra Club

Wisconsin Power and Light Company ("WPL") hereby supplements its response to Sierra Club's First Set of Discovery to WPL in the above-referenced docket in accordance with Wis. Stat. section 804.01(5).

#### **Objections**

WPL maintains the general and specific objections contained in its original response.

**Supplemental Responses to Requests for Production** 

**Request for Production 3:** 

Produce all studies, presentations, analysis and correspondence related to the potential retirement of Edgewater Unit 3.

#### **Supplemental Response to Request for Production 3:**

WPL maintains the general and specific objections contained in its original response. Subject to and without waiving those objections, WPL has identified and is providing a additional analyses, which are responsive to this request for production.

Dated this 20<sup>th</sup> day of August, 2009.

#### **Attorney Making Objections**

By: /s/ Michael S. Greiveldinger

Michael S. Greiveldinger Attorney 4902 North Biltmore Lane P.O. Box 77007 Madison, WI 53707-1007

Phone: (608) 458-3318 Fax: (608) 458-4820

michaelgreiveldinger@alliantenergy.com

#### **Answers to Request for Production**

By: /s/ Scott R. Smith

Scott Smith Director, Regulatory Affairs 4902 North Biltmore Lane P.O. Box 77007

Madison, WI 53707-1007 Phone: (608) 458-3924

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### VERIFICATION OF WISCONSIN POWER AND LIGHT COMPANY'S CONFIDENTIAL SUPPLEMENTAL RESPONSE TO SIERRA CLUB'S FIRST SET OF DISCOVERY TO WISCONSIN POWER AND LIGHT

State of Wisconsin Dane County

I, Scott R. Smith, am Director, Regulatory Affairs, at Alliant Energy Corporate Services, Inc. ("AECS"), and am responsible for various regulatory activities on behalf of Wisconsin Power and Light Company ("WPL"). The information provided in supplemental response to Sierra Club's first discovery request, request for production 3, is not necessarily within my personal knowledge. The responses were assembled by authorized employees of WPL. I have reviewed the above responses to the requests for production, which were prepared in reliance on information from officers, agents, employees, and records of AECS as agent for WPL, and WPL itself. The responses are true to the best of my knowledge, except as to those matters answered on information and belief. As to those matters, I believe them to be true.

/s/ Scott R. Smith
Scott R. Smith

Signed and sworn to before me this 20<sup>th</sup> day of August, 2009.

/s/ Kathy M. Chiono

Notary Public, State of Wisconsin My commission expires February 24, 2013.